

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA

Case No. 1:25-cr-90

Plaintiff,

v.

Hon. HALA Y. JARBOU

CARMEL MOSES SKINNER

Defendant(s).

GOVERNMENT'S
INITIAL PRETRIAL CONFERENCE
SUMMARY STATEMENT

I. DISCOVERY

A. Statements of Defendant

1. Oral Statements (Rule 16(a)(1)(A))

- There are no written records of oral statements or other oral statements as defined in Rule 16(a)(1)(A).
 There are the following written records of oral statements:

police reports from April 10 and 17, 2025

The substance of which

- has been disclosed to defense counsel.
 will be disclosed to defense counsel by _____ upon entry of pro. order .

2. Written or Recorded Statements (Rule 16(a)(1)(B))

- There are no written or recorded statements or grand jury testimony of defendant.
 There are the following written or recorded statements or grand jury testimony:

police body camera from April 10 and 17, 2025

All written or recorded statements

- have been disclosed to defense counsel.
 will be disclosed to defense counsel by _____ upon entry of pro. order .

B. Defendant's Prior Record (Rule 16(a)(1)(D))

- The Government has made due inquiry and is not aware of any prior criminal record.
- The Government has disclosed defendant's prior criminal history.
- The Government is now making inquiry into defendant's prior criminal history. The results will be disclosed to defense counsel upon receipt.

C. Documents and Tangible Objects (Rule 16(a)(1)(E))

- The Government has no documents, tangible objects, or physical evidence required to be disclosed.
- The Government has the following documents, tangible objects, and physical evidence:
- | | | |
|--|---|---|
| <input checked="" type="checkbox"/> Drug Paraphernalia | <input type="checkbox"/> Drug Records | <input type="checkbox"/> Inventory (attached) |
| <input checked="" type="checkbox"/> Controlled Substances: | _____ identified in indictment | |
| <input type="checkbox"/> Records: | _____ | |
| <input checked="" type="checkbox"/> Firearms: | _____ identified in indictment | |
| <input checked="" type="checkbox"/> Other: | _____ photos from April 10 and 17, 2025 | |
- The Government voluntarily notifies the defendant of the following search warrants issued and the warrant returns:
- | | | |
|---|----------------|--------------------------|
| <input checked="" type="checkbox"/> State | | |
| <input type="checkbox"/> Federal: | Case No. _____ | Re: _____ residential SW |
| | Case No. _____ | Re: _____ |
| | Case No. _____ | Re: _____ |
- They have been made available for inspection and copying by defense counsel.
- Defense counsel should make arrangements with:
AUSA Olivia Kay Ghiselli

D. Reports of Examinations and Tests (Rule 16(a)(1)(F))

- The Government has no reports of examinations or tests required to be disclosed by Rule 16.
- The Government has or expects to have reports of the following examinations and tests:
- | | | |
|---|--|--|
| <input checked="" type="checkbox"/> Drug Analysis | <input type="checkbox"/> Handwriting | <input type="checkbox"/> Fingerprints |
| <input type="checkbox"/> DNA | <input checked="" type="checkbox"/> Firearms/Nexus | <input type="checkbox"/> Gun Operability |
| <input type="checkbox"/> Computer Forensics | <input type="checkbox"/> Other: _____ | |

E. Reciprocal Discovery

- The Government seeks reciprocal discovery.

F. Notice Under FRE 404(b)

- The Government does not presently intend to introduce 404(b) evidence.
- The Government does presently intend to introduce the following 404(b) evidence:

- The Government will provide pretrial notice of 404(b) evidence by 2 wks before FPTC.

G. Other Discovery Matters
II. TRIAL

- A. The Government requests a jury non-jury trial.
- B. The length of trial excluding jury selection is estimated at 2-3 days.

III. MISCELLANEOUS

The parties acknowledge that if the case is appropriate for expedited resolution, a joint motion for expedited sentencing shall be filed within 14 days of arraignment.

- The Government is unaware at this time of any known conflict with defendant's representation by counsel. The United States will immediately advise counsel if any such conflict becomes known.
- The Government is aware of the following potential conflicts:

- Government's plea negotiation policy:

No concessions unless plea hearing is completed at least two (2) weeks before FPTC.

Date June 17, 2025

/s/ Olivia Kay Ghiselli
Counsel for the United States